

(I) Introduction

- 1) Grace (S.C.C.) Church (“GSCCC”) is committed to complying with the Personal Data Protection Act (the “PDPA”) in the collection, use and disclosure of personal data which is in its possession or will come into its possession.
- 2) This Data Protection Policy (the “Policy”) forms the policies and practices adopted by GSCCC in the collection, use and disclosure of personal data which is in its possession or which may come into its possession.
- 3) Personal data means data, whether true or not, about an individual who can be identified either from that data and or from other information to which GSCCC has or is likely to have access. Personal data includes, but is not limited to the following:
 - a) Name;
 - b) NRIC/FIN/Passport number;
 - c) Address;
 - d) Date of birth;
 - e) Gender
 - f) Marital status;
 - g) Contact information, for example telephone numbers and email addresses;
 - h) Signature;
 - i) Photograph;
 - j) Video;
 - k) Family member’s information;
 - l) All types of faith pledge and donation information;
 - m) All types of commitment pledges;
 - n) Nationality;
 - o) Occupation; or
 - p) Health or medical information
- 4) For the purposes of this Policy, pastoral care shall refer to, in general and without limitation, the offering of emotional and spiritual support and guidance by GSCCC pastoral care co-workers (whether employees or volunteers). Pastoral care may include any of the following:
 - a) providing of care for the well-being of individuals;
 - b) counselling;
 - c) maintenance of personal relationships;
 - d) discipleship and mentoring;
 - e) performing of ceremonies;
 - f) providing of religious education; or
 - g) the facilitation of individuals’ practice of Christianity.

The pastoral care co-workers (whether employees or volunteers) of GSCCC will respect the privacy and confidentiality of individuals.

(II) Data Protection Officer

- 5) GSCCC is to appoint a Data Protection Officer (“DPO”) who will be responsible for ensuring GSCCC’s compliance with the PDPA.
 - a) The DPO may delegate its roles and responsibilities to other individuals.

- b) A reference in this Policy to the DPO shall include the delegates of the DPO where applicable.
- 6) All persons, whether employees or church members, who collect, process, or use personal information on behalf of GSCCC shall be accountable to the DPO.
- 7) The DPO is responsible for ensuring that GSCCC complies with the Personal Data Protection Act in the collection, use and disclosure of personal data which is in or which will come into GSCCC's possession.
- 8) The DPO is to ensure that GSCCC is open about the Policy regarding the management of personal information. This document shall be made available upon request in accordance with clause 10 below.
- 9) The DPO is to ensure that the following information is made available at the Church Office upon request by any person:
 - a) the business contact information of at least one DPO;
 - b) the procedure for an individual to request access to personal data about that individual which is in GSCCC's possession or control; and
 - c) the procedure to lodge a complaint to GSCCC.

(III) Policy to be made available

- 10) This document shall be made available upon request. This document may be found at GSCCC's website <http://www.gsgccc.org.sg/> or at GSCCC's office located at 14 Queen Street, Singapore 188536 (the "Church Office").
- 11) This document may be amended from time to time as and when GSCCC in its absolute discretion deems necessary or appropriate.

(IV) Purposes for collection, use and disclosure of personal data

- 12) GSCCC collects, uses and discloses personal data for purposes which may include, but are not limited to, the following:
 - a) Planning, organising and holding church services, events, activities, courses and programmes;
 - b) Administration and management of GSCCC's operations, functions or other internal matters as the case may be including record keeping;
 - c) Pastoral care of GSCCC members or other individuals where applicable;
 - d) To communicate with an individual in respect of:
 - (i) any of the matters described in this clause;
 - (ii) the individual's membership with GSCCC;
 - (iii) responding to a request or query by the individual;
 - (iv) responding to and resolving any complaints;
 - (v) any matters by reason of which the individual is reasonably associated with, affiliated with or connected to GSCCC; or
 - (vi) any other matters in respect of which it is reasonably necessary for GSCCC to communicate with the individual; whereby such communication may take the form of voice calls, SMS, other messages receivable on a mobile phone (e.g. WhatsApp, Tango, Line, WeChat, Skype messages etc.), email, fax or post;
 - e) Providing services to one or more individuals, a community or the general public;

- f) Internal and external communications and publications;
 - g) For the purposes of the GSCCC Pastoral Care Ministry, which include without limitation the following carried out by members of the Pastoral Care Ministry:
 - (i) Addressing an individual at GSCCC events or activities to welcome that individual;
 - (ii) Communicating with an individual in the manner described at subclause (b) of this clause;
 - (iii) Visitations at an address provided by the individual, including but not limited to the individual's home, place of work, a hospital or dormitory etc.;
 - (iv) Meeting with the individual, including to have a meal with the individual, for counselling, to communicate personal experiences and to provide spiritual support; and
 - (v) Conducting ceremonies, for example house blessings, weddings and funerals; or
 - h) Any other purposes of which GSCCC may notify individuals from time to time.
- 13) Subject to the provisions of the PDPA or this Policy, GSCCC may disclose personal data to persons or entities which may include the following:
- a) GSCCC staff, co-workers and volunteers;
 - b) Agents, contractors or third party service providers who provide services to GSCCC, for example website maintenance, courier, printing, accommodation, transport, security, training etc;
 - c) Providers of professional services, including auditing and legal services;
 - d) Government authorities and law enforcement agencies; or
 - e) Any other person or entity to whom an individual has provided consent to disclosure of his or her personal data.

(V) Consent

- 14) Where an individual submits his or her personal data to GSCCC, the individual is deemed to have agreed to and consented to the collection, use and disclosure of his or her personal data by GSCCC for the purposes stated in Part IV above.
- 15) If GSCCC intends to collect, use or disclose personal data in a manner different to that set out in clause 17 or for a purpose other than those stated in Part IV above, GSCCC is to obtain fresh consent, whether in writing or otherwise, from the individual for the additional manner or purpose.

(VI) Collection of personal data

- 16) GSCCC is to only collect personal data that is reasonably necessary to fulfil the purposes for which the personal data is collected.
- 17) Personal data is to be collected by fair and lawful means, without misleading or deceiving individuals as to the purposes for collection of personal data about them. The avenues by which GSCCC may collect personal data include, but are not limited to:
- a) Application form(s) submitted by an individual to GSCCC, such as membership application forms or other forms relevant to events and activities organised or managed by GSCCC;
 - b) Where an individual contacts staff or representatives of GSCCC to make enquiries or in relation to pastoral care, whether such contact is by email, voice calls, or otherwise;

- c) Where an individual attends at the Church Office for the purpose of making enquiries or to make requests relating to pastoral care or any events, activities, courses or programs organised, conducted or managed by GSCCC;
 - d) Where an individual makes a donation to GSCCC;
 - e) Where an individual makes a request to GSCCC to contact that individual for any purpose;
 - f) Where an individual submits that individual's personal data for the purpose of employment;
 - g) Where an individual submits that individual's personal data for the purpose of volunteering as a co-worker at GSCCC's events, activities, programs or courses.
- 18) Personal data collected before 2 July 2014.
- a) GSCCC is not required to obtain consent for the collection of personal data before 2 July 2014.
 - b) If an individual does not want GSCCC to retain his or her personal data collected before 2 July 2014, the individual must give reasonable notice to GSCCC to withdraw his or her consent to GSCCC's retention of that personal data. Upon receiving such reasonable notice, GSCCC is to cease to retain that individual's personal data (except where such retention is required or authorised by law). GSCCC is to inform the individual of any likely legal consequences of withdrawing his or her consent.
- 19) Personal data collected after 2 July 2014.
- a) After 2 July 2014, GSCCC is to obtain the consent of an individual before collecting personal data about that individual. This includes the collection of additional personal data about an individual whom GSCCC has collected personal data before 2 July 2014.
 - b) Where one of the exceptions in the PDPA applies, consent is not required for the collection of personal data.

(VII) Use of personal data

- 20) GSCCC may use personal data collected before 2 July 2014 for the purposes for which the personal data was collected, whether such use occurs before or after 2 July 2014.
- 21) GSCCC is to obtain consent to use personal data that has been collected after 2 July 2014.
- 22) Where an individual withdraws his or her consent in accordance with clause 49 of this Policy, GSCCC must cease to use that individual's personal data within a reasonable time, whether that personal data was collected before or after 2 July 2014.
- 23) Where one of the exceptions in the PDPA applies, consent is not required for the use of personal data, whether the personal data was collected before or after 2 July 2014.
- 24) GSCCC is to obtain the consent of an individual to use personal data for a purpose other than the purposes for which the personal data was first collected, whether such use occurs before or after 2 July 2014.

(VIII) Disclosure of personal data

- 25) GSCCC may disclose personal data collected before 2 July 2014 for the purposes for which that personal data was collected, whether such disclosure occurs before or after 2 July 2014.
- 26) GSCCC is to obtain consent to disclose personal data that has been collected after 2 July 2014.

- 27) Where an individual withdraws his or her consent in accordance with clause 49 of this Policy, GSCCC must cease to disclose that individual's personal data within a reasonable time, whether that personal data was collected before or after 2 July 2014.
- 28) Where one of the exceptions in the PDPA applies, consent is not required for the disclosure of personal data, whether the personal data was collected before or after 2 July 2014.
- 29) GSCCC is to obtain the consent of an individual to disclose personal data for a purpose other than the purposes for which the personal data was first collected, whether such disclosure occurs before or after 2 July 2014.

(IX) Personal data of deceased individuals

- 30) Parts VIII and XII of this Policy shall apply in respect of personal data about deceased individuals.

(X) Retention of personal data

- 31) GSCCC shall retain personal data of individuals as long as it is necessary to fulfil the purpose for which the data is collected and for such other use as to be part and parcel of GSCCC Pastoral Care Ministry.
- 32) GSCCC is to ensure that any personal data that is no longer serving the purpose(s) for which it is collected, or that is no longer necessary to be retained for the purposes of the GSCCC Pastoral Care Ministry or for any legal or business purpose, is removed or made anonymous.

(XI) Access to personal data

- 33) On request by an individual, GSCCC is to provide the individual with personal data about that individual that is in its possession, and information about the way GSCCC or another organisation may have used or disclosed that personal data within 1 year before the date of request, unless the exceptions in the PDPA apply. If GSCCC has supplied such personal data to third parties, GSCCC shall endeavour to be as specific as possible about how it has used or disclosed that personal data.
- 34) GSCCC is to respond to an individual's request within a reasonable time and at minimal cost to the individual. The requested information shall be made available in a generally understandable form. For example, any abbreviations or codes used to record information should be explained to the individual.
- 35) GSCCC is not required to provide the individual's personal data or other information where such provision could reasonably be expected to:
 - a) threaten the safety or physical or mental health of the individual making the request or another individual;
 - b) reveal personal data about another individual; or
 - c) be contrary to the national interest.

(XII) Protection of personal data

- 36) GSCCC is to take reasonable steps to protect personal data in its possession or control by making reasonable arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks related to personal data in its possession or control.
- 37) GSCCC may implement protection measures, for example:

- a) physical measures such as locked filing cabinets and restriction of access to offices;
 - b) restriction of personnel access to personal data, for example, security clearance and limiting of access to a “need-to-know” basis; and
 - c) technological measures such as the password protection and/or encryption of information stored in an electronic medium.
- 38) Where in GSCCC’ sole opinion, certain personal data is of a more sensitive nature, that personal data is to be under a higher standard of protection.
- 39) Where personal data is disclosed to third parties, GSCCC is to use her best endeavours to ensure that those third parties provide a comparable standard of protection to that personal data. Nothing in this Policy shall operate to make GSCCC liable for any loss, destruction, unauthorised access, unauthorised use, misuse or other wrongful handling of the personal data caused by an act or omission of the third parties. No indemnity is provided by GSCCC to third parties for any wrongful acts or omissions of those third parties.
- 40) GSCCC is to ensure that all employees and volunteers are aware of the importance of protecting the confidentiality of personal data.
- 41) GSCCC is to ensure that care is taken when personal data is to be disposed of or destroyed to prevent unauthorised parties from gaining access to that personal data.

(XIII) Accuracy of personal data

- 42) Where personal data is likely to be used by GSCCC to make a decision that affects an individual or is likely to be disclosed to another organisation, GSCCC shall take reasonable steps to ensure that the personal data is reasonably accurate when it is collected. Where amendment is necessary, GSCCC should amend the personal data as required through the correction, deletion, or addition of personal data. Where appropriate, the amended personal data shall be transmitted to third parties having access to the personal data in question.
- 43) GSCCC is to ensure that any routine updating of personal data to be carried out must be reasonably necessary to fulfil the purposes for which the information was collected.
- 44) GSCCC is to ensure that personal data that is used on an ongoing basis, including personal data that is disclosed to third parties, is reasonably and generally accurate.
- 45) An individual may make a request to GSCCC under clause 49 to correct an error or omission in the personal data about that individual that is in GSCCC’s possession or control.

(XIV) Requests / Complaints process

- 46) An individual may withdraw his or her consent to the collection, use or disclosure of his or her personal data by giving reasonable notice to GSCCC to do so.
- 47) An individual who does not wish for GSCCC to retain his or her personal data may give reasonable notice to GSCCC to withdraw his or her consent to the retention of his or her personal data. GSCCC is to inform the individual of any likely legal consequences of withdrawing his or her consent. GSCCC must cease to retain personal data about the person within a reasonable time unless there are circumstances under which retention does not require the individual’s consent.
- 48) Where an individual withdraws his or her consent for GSCCC to collect, use or disclose his or her personal data, GSCCC may be prevented from responding to a request of that individual or

to perform the purposes set out in Part IV above, in particular the purposes relating to the Pastoral Care Ministry.

- 49) An individual who wishes to make a request, or to lodge a complaint to GSCCC pertaining to any failure to comply with the provisions of the PDPA, may make the request or lodge the complaint by doing either of the following:
 - a) visiting the Church Office and filling in a Requests/Complaints form;
 - b) contacting the DPO, whose business contact information is available at <http://www.gsgccc.org.sg/> and at the Church Office; or
 - c) in writing by post sent to the Church Office.
- 50) The DPO is to investigate the complaint within a reasonable time of receiving the request or complaint and is to contact the complainant within a reasonable time, in order to address any concerns relating to compliance with the PDPA.
- 51) Where individuals inquire about lodging complaints, the DPO is to give individuals information on the procedure referred to in clause 49 of this Policy.
- 52) Where necessary, the DPO shall take appropriate measures which may include amendment of this Policy.